

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2021-13-A - ORDER NO. 2022-409

JUNE 8, 2022

IN RE: Application of Chem-Nuclear Systems, LLC,)	ORDER APPROVING
a Subsidiary of EnergySolutions Company, for)	AND IDENTIFYING
Adjustment in the Levels of Allowable)	ALLOWABLE COSTS
Costs and for Identification of Allowable)	
Costs (Fiscal Year 2021-2022))	

I. INTRODUCTION

This matter comes before the Public Service Commission of South Carolina (“PSC” or the “Commission”) by way of the Application of Chem-Nuclear Systems, LLC, a subsidiary of EnergySolutions Company (“Chem-Nuclear” or the “Company”), dated September 24, 2021 (the “Original Application”). By its Original Application, Chem-Nuclear sought an adjustment in the levels of certain allowable costs for Fiscal Year 2020-2021, which the Commission had previously identified, and for the identification of allowable costs for Fiscal Year 2021-2022, all of which are associated with the operation of the Company’s regional low-level radioactive waste disposal facility located in the vicinity of Barnwell, South Carolina (the “Barnwell Facility”).¹

The Original Application was submitted pursuant to the provisions of the Atlantic Interstate Low-level Radioactive Waste Compact Implementation Act (the “Act”), which is codified as S.C. Code Ann. § 48-46-10, *et. seq.* (2008 & Supp. 2021). On February 25,

¹ Application for Fiscal Year 2021-2022, dated September 24, 2021, pp. 3-4, ¶¶ 11-13; Exhibits A, B, and C.

2022, the Company filed and served an Amended Application and Exhibits (“Amended Application”). The Amended Application proposed certain revisions to the information contained in the Original Application to reflect the Company’s reconciliation of certain issues with the South Carolina Office of Regulatory Staff (“ORS”). Also, on March 1, 2022, the Company filed and served the Direct Testimony of Benjamin S. Smith, reflecting the position of the Company as contained in the Amended Application and Exhibits.

The Act established a comprehensive economic regulatory program and governs the relationship between the State of South Carolina and operators of facilities for the disposal of low-level radioactive waste. Among other things, the Act provides for South Carolina’s membership in the Atlantic Interstate Low-Level Radioactive Waste Management Compact Commission (the “Compact Commission”) and authorizes the manner in which South Carolina participates in the Compact Commission with the other two member states, Connecticut, and New Jersey.²

The Act fixed a schedule of annually declining maximum volumes of low-level radioactive waste that a disposal facility in South Carolina may accept from generators within and without the Compact Commission’s member states.³ Starting on July 1, 2008, the Barnwell Facility was limited to accepting waste exclusively from generators in South Carolina, New Jersey, and Connecticut, the three Compact Commission states.

In addition, the Act fixes responsibility for the approval of disposal rates for low-level radioactive waste and provides for the disposition of revenues produced by the operation of disposal facilities subject to the Act. The Barnwell Facility is the only disposal

² S.C. Code Ann. § 48-46-20 (2008).

³ S.C. Code Ann. § 48-46-40(A)(6)(a) (Supp. 2021).

facility for low-level radioactive waste in South Carolina.

Under the Act, the Commission has the responsibility to identify the “allowable costs” of a disposal facility operator.⁴ “Allowable costs” are “costs to a disposal site operator of operating a regional disposal facility,” and they “are limited to costs determined by standard accounting practices and regulatory findings to be associated with facility operations.”⁵ The Act provides that “allowable costs” expressly include the costs of certain specifically identified activities necessary in the operation of a low-level radioactive waste facility, in addition to any other costs directly associated with disposal operations determined by the Commission as allowable.⁶ The Act excludes from identification as “allowable costs” the costs of certain expressly listed activities “and other costs determined by the PSC to be unallowable.”⁷

The Act entitles a disposal facility operator to recover an operating margin of twenty-nine percent (29%). This operating margin is authorized for the total amount of all identified “allowable costs,” excluding allowable costs for taxes, licensing, and permitting fees, which the operator is required to remit to governmental entities.⁸

The level of “allowable costs” and the statutory operating margin affects the amount of annual revenue that a disposal facility operator remits to the State of South Carolina. At the end of the fiscal year, the operator pays the South Carolina Department of Revenue an amount equal to the total revenue that the operator had received for waste disposal services during the fiscal year, reduced by the operator’s identified “allowable costs,” and reduced

⁴ S.C. Code Ann. § 48-46-40(B)(1) (Supp. 2021).

⁵ S.C. Code Ann. § 48-46-30(1) (2008).

⁶ S.C. Code Ann. § 48-46-40(B)(3)(a) through (n) (Supp. 2021).

⁷ S.C. Code Ann. § 48-46-40(B)(3) (2008 & Supp. 2021).

⁸ S.C. Code Ann. § 48-46-40(B)(5) (Supp. 2021).

further by the twenty-nine percent (29%) statutory operating margin on the “allowable costs” under the Act, and reduced further by payments that the operator made during the fiscal year for reimbursement of administrative costs incurred for the conduct of certain state agencies’ functions in administering the Act.⁹

The Act provides that the operator of a low-level radioactive waste disposal site may apply to the Commission for adjustments in the levels of “allowable costs,” which the Commission had identified for the previous fiscal year and for identification of costs which the Commission had not previously identified as “allowable costs.”¹⁰ Upon disposition of the issues in an application, the Act requires the Commission to authorize the site operator to adjust its “allowable costs” for the current fiscal year to compensate the site operator for revenues “lost” during the previous fiscal year (that is, the difference between the level of “allowable costs” previously identified and the level of “allowable costs” identified upon approval of the application).¹¹

Chem-Nuclear filed its Original and Amended Applications in this proceeding seeking to adjust the level of certain “allowable costs” which the Commission identified in Order No. 2021-412 and the amount of such costs that the Company actually experienced in the Fiscal Year 2020-2021. The Original Application and Amended Application also sought identification of the Company’s “allowable costs” for Fiscal Year 2021-2022.

Chem-Nuclear’s Original and Amended Applications sought an adjustment for additional compensation for the “irregular costs” that were established by Order No. 2021-

⁹ S.C. Code Ann. § 48-46-60(B) and (C)(Supp. 2021).

¹⁰ S.C. Code Ann. § 48-46-40(B)(4) (Supp. 2021).

¹¹ *Id.*

412 and applied during Fiscal Year 2020-2021. The actual incurred irregular costs were \$20,192 more than the costs allowed by the rates set previously.¹²

Additionally, Chem-Nuclear's Original and Amended Applications sought an adjustment for additional compensation for the Company for the "variable labor and non-labor costs" incurred in Fiscal Year 2020-2021, as the actual costs specified in the Original and Amended Applications as variable labor and non-labor costs were \$10,210.22 more than those identified and approved in Order No. 2021-412.¹³

Upon receipt of the Company's Original Application, the Commission Clerk's Office directed Chem-Nuclear to publish a Notice of Filing and Hearing and Pre-file Testimony Deadlines, advising the public of the submission of the Original Application and of the manner in which interested persons might intervene or otherwise participate in this proceeding. Chem-Nuclear published the Notice in a newspaper of general circulation on October 17, 2021, and furnished Proof of Publication to the Commission on November 3, 2021.

The Act specifies certain agencies to be parties of record in proceedings for identification of "allowable costs" before the Commission. Those parties are the Executive Director of the ORS and the Attorney General for the State of South Carolina.¹⁴ In addition, the Compact Commission and the South Carolina Department of Health and Environmental Control ("DHEC") have the discretion under the Act to participate as

¹² Amended Application for Fiscal Year 2021-2022, ¶13 and Amended Exhibit A to the Amended Application, p. 4.

¹³ Amended Application for Fiscal Year 2021-2022, ¶11 and Amended Exhibit A to the Amended Application, p. 2.

¹⁴ S.C. Code Ann. § 48-46-40(B)(9) (Supp. 2021).

parties.¹⁵ Pursuant to the provisions of S.C. Code Ann. § 48-46-40(B)(9), ORS participates as a party to these proceedings in order to represent “the interests of the State of South Carolina.”

On April 14, 2022, the Commission held a virtual evidentiary hearing with respect to the Company’s Amended Application. The Honorable Justin T. Williams, Chairman, presided during the hearing. F. David Butler, Esquire, served as Advisor to the Commission. Appearances were as follows: J. David Black, Esquire, represented Chem-Nuclear, and Christopher M. Huber, Esquire, and Donna L. Rainey, Esquire, represented ORS. No other person or entity petitioned to intervene in this docket. The South Carolina Attorney General’s Office did not appear or participate in the hearing.

During the virtual evidentiary hearing, ORS’s Examination Report, with the attached Exhibits 1 and 2, along with the cover letter filing the Examination Report, were entered into the record as Hearing Exhibit 1. Chem-Nuclear presented the testimony of one Witness, Benjamin S. Smith, Chem-Nuclear’s Director for Barnwell Disposal Operations. The pre-filed Amended Direct Testimony of Mr. Smith was entered into the record and Chem-Nuclear’s Amended Application, with attached Amended Exhibit A, Amended Exhibit B, and Amended Exhibit C, were entered into the record as Hearing Exhibit No. 2.

¹⁵ *Id.*

II. DISCUSSION OF ISSUES

All of the issues relating to the identification of “allowable costs” for Fiscal Year 2020-2021 and for Fiscal Year 2021-2022 were resolved between the parties or were not contested in the evidence or positions of the parties. Consequently, the Commission will discuss the issues in general to reflect our reliance upon the evidentiary record for the findings and conclusions in this order.

A. “Allowable Costs” for Fiscal Year 2020-2021

In accordance with the provisions of the “Collaborative Review of Chem-Nuclear’s Operations and Efficiency Plan” (“OEP”), approved in Order No. 2004-349 for use in these “allowable cost” proceedings, Chem-Nuclear’s Original and Amended Applications separated costs into three (3) categories: fixed, variable, and irregular.¹⁶ As recognized in Order No. 2004-349, the OEP is valid for use as a “baseline for establishing a method for identifying ‘allowable costs.’”¹⁷

1. Fixed Costs for Fiscal Year 2020-2021

Chem-Nuclear separated its fixed costs for Fiscal Year 2020-2021 into several general categories: labor, fringe, and non-labor costs, corporate allocation of general and administrative expense, equipment leases and support, depreciation, and insurance, as well as those fixed costs for which the statutory operating margin was not applicable, such as legal support. The Company’s operating expense for that period resulted in total fixed costs of \$3,083,236, which Chem-Nuclear actually incurred.¹⁸ The total fixed costs

¹⁶ See, Hearing Exhibit 2, Amended Exhibit A, pp. 1-4; Hearing Exhibit No. 1, ORS Examination Report, Exhibit 1, pp. 1-2.

¹⁷ Order No. 2004-349, p. 17.

¹⁸ Hearing Exhibit No. 2, Amended Application ¶10 and Amended Exhibit A, p. 1.

incurred for 2020-2021 were \$4,714 more than the level of fixed costs anticipated in Order No. 2020-412.¹⁹ The record supports the identification of \$3,083,236 as fixed “allowable costs” for Fiscal Year 2020-2021.

2. Variable Material Costs for Vaults for Fiscal Year 2020-2021

The actual costs for vaults are predicated on a number of factors, including the size and shape of waste packages and the number and size of vaults required for disposal. For Fiscal Year 2020-2021, Chem-Nuclear’s actual cost for disposal vaults was \$373,546.²⁰ This amount is \$53,531.37 less than the \$427,077.37 calculated vault cost using the rates established in Order No. 2020-412. Therefore, the Company proposes no adjustment in this category of costs in its Amended Application.

3. Variable Labor Costs and Non-Labor Costs for Fiscal Year 2020-2021

Order No. 2020-412 identified the following categories of rates for projecting variable labor and non-labor costs: vault purchase and inspection (per vault), ABC waste disposal (per shipment), slit trench waste operations (per slit trench offload), customer assistance (per shipment), and maintenance of trench records (per container).²¹ The Company incurred actual variable labor and non-labor costs of \$127,538.15 in Fiscal Year 2020-2021. This amount is \$10,210.22 more than the amount that was anticipated based on rates provided in Commission Order 2021-412. Therefore, the Company proposes an adjustment of \$10,210.22 in this category of costs.

¹⁹ Hearing Exhibit No. 2, Amended Application ¶10 and Amended Exhibit A, p. 1; Hearing Exhibit No. 1, ORS Examination Report, Exhibit 1, p. 1.

²⁰ Hearing Exhibit No. 2, Amended Application ¶12, Amended Exhibit A, p. 3.

²¹ Hearing Exhibit No. 2, Amended Exhibit A, p. 2.

4. Irregular Costs for Fiscal Year 2020-2021

Irregular costs include costs for projects that are nonrecurring annually, or varying costs for projects which continue for more than a year. This category includes, but is not limited to, costs associated with trench design, site engineering, site maintenance, and license renewal and appeal costs.²² The record contains descriptions of each project and the actual costs that Chem-Nuclear incurred for them in Fiscal Year 2020-2021.²³ The evidence in the record establishes that Chem-Nuclear incurred actual irregular costs for Fiscal Year 2020-2021 of \$597,469.45.²⁴ This amount is \$20,192 more than the \$577,277 in irregular costs identified in Commission Order No. 2021-412. The record supports treatment of actual irregular costs for fiscal year 2020-2021 of \$597,469.45 as “allowable.”

B. Proposed “Allowable Costs” for Fiscal Year 2021-2022

Chem-Nuclear’s Amended Application and the evidence in the record presented “allowable costs” to be identified for Fiscal Year 2021-2022, separated into the three (3) cost categories that were described in the Collaborative Review of the OEP and adopted in Order No. 2004-349: fixed costs, variable costs, and irregular costs.

1. Allowable Fixed Costs for Fiscal Year 2021-2022

Chem-Nuclear proposed fixed costs of \$3,318,742 to be identified as “allowable costs” for Fiscal Year 2021-2022. That amount was based on costs incurred in the first half of Fiscal Year 2021-2022 and activities anticipated for the second half of the fiscal

²² Hearing Exhibit No. 2, Amended Exhibit A, p. 4.

²³ Hearing Exhibit No. 2, Amended Exhibit A, p. 4, Amended Exhibit B.

²⁴ Hearing Exhibit No. 2, Amended Exhibit A, p. 4; Hearing Exhibit No. 1, Exhibit 1, p. 2.

year.²⁵

2. Allowable Irregular Costs for Fiscal Year 2021-2022

Chem-Nuclear's Amended Application includes general categories of projects with estimated total costs of \$342,738, which it categorized as irregular costs for Fiscal Year 2021-2022. These irregular costs, identified in Amended Exhibit C in Hearing Exhibit No. 2, are based on costs incurred in the first half of Fiscal Year 2021-2022 and activities anticipated for the second half of the fiscal year.²⁶ A total of \$425,493 in various irregular project costs was summarized in Exhibit C of the Original Application; however, the Amended Application proposes a total of \$342,738 in irregular costs as shown in Amended Exhibit C.²⁷ The decrease is primarily due to a decrease in proposed Site Maintenance costs in the Amended Application.²⁸

3. Variable Material Cost (Vaults) Rates for Fiscal Year 2021-2022

For Fiscal Year 2021-2022, Chem-Nuclear proposed variable material cost rates for each category of waste based upon actual experience during Fiscal Year 2020-2021, and then inflated by 2.5%.²⁹

4. Variable Labor and Non-Labor Rates for Fiscal Year 2021-2022

For Fiscal Year 2021-2022, Chem-Nuclear proposed rates for variable labor and

²⁵ Hearing Exhibit No. 2, Amended Exhibit C; Hearing Exhibit No. 1, Exhibit 2, p. 1; Amended Direct Testimony of Witness Smith, p. 10.

²⁶ Hearing Exhibit No. 2, Amended Exhibit C; Hearing Exhibit No. 1, Exhibit 2; Amended Direct Testimony of Witness Smith, p. 11.

²⁷ Hearing Exhibit No. 2, Amended Exhibit C; Original Application, Exhibit C.

²⁸ Amended Direct Testimony of Witness Smith, p. 11.

²⁹ Amended Direct Testimony of Witness Smith, p. 11; *see also* Hearing Exhibit 2, Amended Exhibit C

non-labor costs.³⁰ Those rates pertained to five (5) categories:

- vault purchase and inspection (per vault);
- ABC waste disposal (per shipment);
- slit trench shipment (per offload);
- customer assistance (per shipment); and
- trench records (per container).

The rates for vault purchase and inspection, ABC waste disposal, slit trench operations, customer assistance, and trench records were based on actual experience during Fiscal Year 2020-2021, then inflated by 2.5%.³¹

III. FINDINGS AND CONCLUSIONS

Based on the Record of this case, the Commission makes the following Findings of Fact and Conclusions of Law:

1. The Public Service Commission of South Carolina is authorized and directed by S.C. Code Ann. § 48-46-40(B), et seq. to identify allowable costs for Chem-Nuclear's operation of a regional low-level radioactive waste disposal facility in South Carolina. The facility is located in Barnwell, South Carolina.

2. Chem-Nuclear has operated the disposal site continuously since 1971 without interruptions. Undisputed amounts in Chem-Nuclear's accounts that are identified and approved by this Commission as "allowable costs" for the Fiscal Year ending June 30, 2021 (Fiscal Year 2020-2021) are included in Appendix A, which is attached to this Order as Order Exhibit No. 1.

³⁰ Hearing Exhibit No. 2, Amended Exhibit C.

³¹ Amended Direct Testimony of Witness Smith, p. 11.

3. These “allowable costs” total \$4,181,789.60 as follows:

Allowable Costs – Fiscal Year Ending June 30, 2021³²		
Description		Allowable Cost
Total Fixed Costs		\$ 3,083,236.00
Labor, Fringe & Non-Labor	\$2,000,883.00	
Depreciation	\$ 124,693.00	
Insurance	\$ 245,702.00	
Equipment Leases and Support	\$ 119,006.00	
Corporate Allocations (G&A)	\$ 592,952.00	
Legal Support (License Appeal)*	\$ 0.00	
Total Variable Costs		\$ 501,084.15
Variable Labor & Non-Labor	\$ 127,538.15	
Vault Costs	\$ 373,546.00	
Total Irregular Costs		\$ 597,469.45
Total Allowable Costs		\$ 4,181,789.60
*Not subject to statutory operating margin.		
** Categories of costs include: (1) vault purchase and inspection, (2) ABC waste disposal, (3) slit trench operations, (4) customer assistance, and (5) trench records.		
*** Order Exhibit No. 1 (Appendix A), p. 2 for a breakdown of irregular cost items.		

4. We approve and identify as “allowable costs” for the Fiscal Year 2021-2022 (ending June 30, 2022) the amounts of \$3,318,742 in fixed costs and \$342,738 in irregular costs, as reflected in Appendix B, which is attached to this Order as Order Exhibit No. 2.

³² Order Exhibit No. 1.

5. These fixed and irregular costs total \$3,661,480 as follows:

Allowable Costs – for Fiscal Year 2021-2022 (Ending June 30, 2022)³³		
Description		Allowable Cost
Total Fixed Costs		\$ 3,318,742
Labor, Fringe & Non-Labor	\$2,204,224	
Depreciation	\$ 129,670	
Insurance	\$ 251,876	
Equipment Leases and Support	\$ 140,000	
Corporate Allocations (G&A)	\$ 592,952	
Legal Support (License Appeal)*	\$ 0	
Total Irregular Costs		\$ 342,738
Trench Characterization & Construction	\$ 287,127	
Equipment Repairs	\$ 0	
Large Component Disposal	\$ 17,235	
Storm Damage Repairs & Clean-Up	\$ 0	
Irradiated Hardware Trench	\$ 38,000	
Site Engineering & Drawing Updates	\$ 0	
Trench Records Software	\$ 376	
Total Fixed and Irregular Costs		\$ 3,661,480
*Not subject to statutory operating margin.		

6. The variable cost rates for the Fiscal Year 2021-2022 (ending June 30, 2022) as those costs and rates are depicted in Appendix B, which is attached to this Order as Order Exhibit No. 2, are appropriately documented, and supported by evidence in the record of this proceeding. The actual expense in the variable cost category will be dependent on the actual volumes and classes of waste received.

³³ Order Exhibit No. 2.

IV. ORDERING PARAGRAPHS

IT IS THEREFORE ORDERED THAT:

1. The undisputed amounts in Chem-Nuclear's accounts that are identified in this proceeding are approved by this Commission as "allowable costs" for the Fiscal Year ending June 30, 2021 (Fiscal Year 2020-2021). They are included in Appendix A, which is attached to this Order as Order Exhibit No. 1. These "allowable costs" total \$4,181,789.60.

2. With regard to this proceeding, "allowable costs" for the Fiscal Year 2021-2022 (ending June 30, 2022) are approved by the Commission for Chem-Nuclear in the amount of (a) \$3,318,742 in fixed costs and (b) \$342,738 in irregular costs, totaling fixed and irregular costs in the sum amount of \$3,661,480. These fixed and irregular costs are reflected in Appendix B, which is attached to this Order as Order Exhibit No. 2.

3. The variable cost rates for the Fiscal Year 2021-2022 (ending June 30, 2022) are approved by the Commission in the same amounts depicted in Appendix B, which is attached to this Order as Order Exhibit No. 2. The actual expense in the variable cost category will be dependent on the actual volumes and classes of waste received. The rates in Appendix B and shown in the table below are appropriately documented and supported by evidence in the record of this proceeding.

Variable Cost Rates for Fiscal Year 2021-2022 (Ending June 30, 2022) ³⁴	
Description	Rate
Class A Waste (per cubic foot)	\$ 38.76
Class B Waste (per cubic foot)	\$ 55.84
Class C Waste (per cubic foot)	\$ 55.84
Slit Trench Waste (per cubic foot)	\$ 188.57

4. Chem-Nuclear shall continue to submit monthly reports of variable cost data to the Commission as required by Commission Order No. 2001-499.

5. This Order shall remain in full force and effect until further order of the Commission.

BY ORDER OF THE COMMISSION:



A handwritten signature in blue ink, reading "Florence P. Belser".

Florence P. Belser, Vice Chair
Public Service Commission of
South Carolina

³⁴ *Id.*

ORDER EXHIBIT NO. 1

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Chem-Nuclear Systems, LLC

Allowable Costs

Fiscal Year Ending June 30, 2021

<u>Description</u>	<u>Allowable Cost</u>
Fixed Costs	
Labor, Fringe and Non-Labor	\$2,000,883
Depreciation	\$124,693
Insurance	\$245,702
Equipment Leases and Support	\$119,006
Corporate Allocations (G&A)	\$592,952
Legal Support (License Appeal)*	\$0
Total Fixed Costs	\$3,083,236
Variable Costs	
Variable Labor and Non-Labor**	\$127,538.15
Vault Costs	\$373,546
Total Variable Costs	\$501,084.15
Irregular Costs ***	
Total Irregular Costs	\$597,469.45
Total Allowable Costs	\$4,181,789.60

* Not subject to statutory operating margin.

**Categories of costs include: Vault Purchase and Inspection, ABC Waste Disposal, Slit Trench Operations, Customer Assistance, and Trench Records.

*** See page 2 of Appendix A for a breakdown of irregular cost items.

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Chem-Nuclear Systems, LLC

Allowable Costs

Fiscal Year Ending June 30, 2021

<u>Irregular Cost Item</u>	<u>Labor</u>	<u>Non-Labor</u>	<u>Total Cost</u>
Trench Characterization and Construction	\$27,276	\$50,470	\$77,746
Equipment Repairs	\$153	\$21,508	\$21,661
Trench Records Software	\$568	\$0	\$568
Site Maintenance	\$1,187	\$0	\$1,187
Storm Damage Repairs and Clean-up	\$51	\$0	\$51
Site Engineering and Drawing Updates	\$141	\$0	\$141
Large Component Disposal	\$61,025	\$435,090	\$496,115
<u>Total Irregular Costs</u>	<u>\$90,401</u>	<u>\$507,068</u>	<u>\$597,469.45</u>

ORDER EXHIBIT NO. 2

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Chem-Nuclear Systems, LLC
Allowable Costs
Fiscal Year 2021-2022 (Ending June 30, 2022)

<u>Description</u>	<u>Allowable Cost</u>
Fixed Costs	
Labor, Fringe, and Non-Labor	\$2,204,244
Depreciation	\$129,670
Insurance	\$251,876
Equipment Leases and Support	\$140,000
Corporate Allocations (G&A, IT)	\$592,952
Legal Support (License Appeal)*	\$0
Total Fixed Costs	\$3,318,742
Irregular Costs	
Trench Characterization and Construction	\$287,127
Equipment Repairs	\$0
Large Component Disposal	\$17,235
Storm Damage Repairs and Clean-up	\$0
Irradiated Hardware Trench	\$38,000
Site Engineering and Drawing Updates	\$0
Trench Records Software	\$376
Total Irregular Costs	\$342,738
Total Fixed and Irregular Costs	\$3,661,480
Variable Costs	
<u>Variable Labor and Non-Labor Rates</u>	
Vault Purchase and Inspection (per vault)	\$203.58
ABC Waste Disposal (per shipment)	\$1,751.48
Slit Trench Operations (per slit trench offload)	\$44,844.35
Customer Assistance (per shipment)	\$162.03
Trench Records (per container)	\$364.24
<u>Variable Material Cost Rates (Vault Costs)</u>	
Class A Waste (per cubic foot)	\$38.76
Class B Waste (per cubic foot)	\$55.84
Class C Waste (per cubic foot)	\$55.84
Slit Trench Waste (per cubic foot)	\$188.57